

EXHIBIT A

FROM :

PHONE NO. : 215 643 0489

Jun. 07 2001 09:48AM P2

06/07/2001 07:53 6104958286

MARKBUONO

PAGE 82

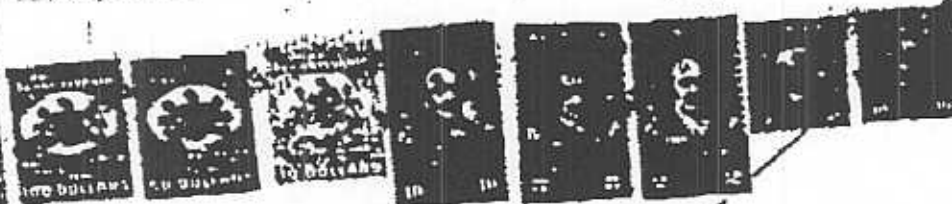
This Deed, made this 22nd day of April, in the year

thousand hundred and fifty-five (1955)  
 Between LEVANIA E. SIMERS, Widow and EDWIN H. SIMERS, both of the Township of Upper  
 Merion, County of Montgomery, Commonwealth of Pennsylvania, (hereinafter called the Grantors),  
 and THE ATLANTIC FEEDING CORP., incorporated in Pennsylvania, (hereinafter called the Grantee).

Witnesseth, That in consideration of SIXTEEN THOUSAND (16,000.00) Dollars,  
 in hand paid, the receipt whereof is hereby acknowledged, the said Grantors - do hereby  
 grant and convey unto the said Grantee, its successors and assigns,  
 ALL THAT CERTAIN piece or parcel of land SITUATE in the Township of Upper Merion, County of  
 Montgomery, Commonwealth of Pennsylvania, more particularly described in accordance with a  
 Survey and Plan thereof made by Robert H. Devaux, Registered Surveyor, dated December 20,  
 1954, as follows, to wit:

Beginning at a steel pipe set at the intersection of the Southwesterly side of Veith Road  
 (45 feet wide) with the Southwesterly side of Linckila Pike (30 feet wide); extending thence  
 (1) along the said Southwesterly side of Veith Road South 42 degrees 03 minutes 30 seconds  
 East 300 feet to a steel pipe; thence (2) at right angles to Veith Road and along line of  
 other land of Levania E. Simers and Edwin H. Simers South 47 degrees 36 minutes 10 seconds  
 West 93.78 feet to a steel pipe; thence (3) still along line of other lands of Levania E.  
 Simers and Edwin H. Simers North 82 degrees West 93.38 feet to a steel pipe set in the  
 Southwesterly side of Linckila Pike; and thence (4) along said Southwesterly side of  
 Linckila Pike North 8 degrees East 300 feet to the steel pipe at the first mentioned point  
 and thence of beginning.

Being part of the same premises which Levania E. Simers, Widow, by Deed dated January 10,  
 1944, and recorded in the Office for the Recording of Deeds in and for Montgomery County in  
 Book 1566, page 44, granted and conveyed to Levania E. Simers, Widow, and Edwin H.  
 Simers, in fee.



PAID BY  
 ORIGINAL  
 PAID ON SOUTH VALLEY  
 COMMERCIAL TITLE CO.  
 BY S. H. [Signature]

D-2366-2N



FROM :

PHONE NO. : 215 643 0489

Jun. 07 2001 09:48AM P3

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6184952266

MARK BLOND  
COMMONWEALTH LAND  
TITLE INSURANCE COMPANY

PAGE 03

SPECIAL WARRANTY DEED

THIS INSTRUMENT is made this 30th day of June 19 83, between ATLANTIC ALUMINUM COMPANY, a Pennsylvania corporation, authorized to transact business in and having an office at 915 South Flower Street, Los Angeles, California 90071 ("GRANTOR") and MARLENE EPSTEIN, R.D. #2, P.O. Box 087, Newtown, Pennsylvania

("GRANTEE").

GRANTOR, in consideration of \$ 115,000 in hand paid does convey unto the GRANTEE, the following described real estate, together with the benefits appurtenant thereto, in the Maple Glen, Upper Dublin Township County of Montgomery, State of Pennsylvania to-wit:

BEGINNING at a steel pipe set at the intersection of the southwesterly side of Welsh Road (45 feet wide) with the southeasterly side of Limekiln Pike (80 feet wide); extending thence (1) along the said southwesterly side of Welsh Road South 42 degrees 03 minutes 20 seconds East 200 feet to a steel pipe; thence (2) at right angles to Welsh Road and along line of other land of Lavinia K. Simmers and Edwin H. Simmers South 47 degrees 56 minutes 40 seconds West 93.38 feet to a steel pipe; thence (3) still along line of other lands of Lavinia K. Simmers and Edwin H. Simmers North 83 degrees West 93.38 feet to a steel pipe set in the said southeasterly side of Limekiln Pike; and thence (4) along said southeasterly side of Limekiln Pike North 8 degrees East 200 feet to the steel pipe at the first mentioned point and place of BEGINNING.

Prior Deed reference: Deed dated April 22, 1955 and recorded in Montgomery County on April 25, 1955 in Deed Book Volume 2666, Page 211.

P-54-00-10180-00-54

MONTGOMERY COUNTY COMMISSIONERS REGISTRY  
14-00-10180-00-54 V DUBLIN  
200 LIMEKILN PIKE  
ATLANTIC REFINING CO  
48 W 31 S 2240 DATE 12/10/01

1150.00  
1150.00  
1150.00

MADE BY ORDER OF THE COMMISSIONERS OF THE MONTGOMERY COUNTY REGISTRY

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF REVENUE

REALTY  
TRANSFER  
TAX

DEBITS

575.00

575.00

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF REVENUE

REALTY  
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The State and County shall collect and remit the tax on all real estate transfers including liens and mortgages.

623140

4726 1760

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**EXHIBIT B**

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF PENNSYLVANIA

3 EXECUTIVE CAR WASH OF : NO. 02-CV-3747  
4 MAPLE GLEN, :  
5 Plaintiff :  
6 vs. :  
7 ENVIRONMENTAL, INC. and :  
8 ENVIRONMENTAL HAZARD :  
9 SERVICES, INC., :  
10 Defendants :

COPY

11  
12 February 19, 2004  
13 Philadelphia, Pennsylvania  
14  
15

16 Oral Deposition of JOHN SECKER,  
17 held in the offices of Marks, O'Neill,  
18 O'Brien & Courtney, 1880 John F. Kennedy  
19 Boulevard, 12th Floor at 12:00 p.m. on  
20 the above date before Michelle M. Zuino,  
21 a Professional Court Reporter and  
22 Commissioner of Deeds in the Commonwealth  
23 of Pennsylvania.

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1 the DEP will notify them.

2 Q. Do they have documentation  
3 at the station that they show you that  
4 their tank has been registered?

5 A. Yes.

6 Q. How long have you been doing  
7 these inspections?

8 A. '97.

9 Q. Prior to you having your own  
10 business where were you employed?

11 A. With Atlantic Petroleum  
12 Technologies.

13 Q. Where were they located?

14 A. In Broomall -- no. Yes.  
15 Broomall. It was two different  
16 locations. But I think Broomall was the  
17 first one.

18 Q. Were they ever at Dutton  
19 Mill Industrial Park?

20 A. In Aston, also.

21 Q. How long did you work for  
22 Atlantic Petroleum Technologies?

23 A. Until '94.

24 Q. From when?



1 A. I believe '91.

2 Q. So in December of '92 were  
3 you employed at Atlantic Petroleum  
4 Technologies, Inc.?

5 A. Yes.

6 Q. I'm going to show you a  
7 document which was previously marked as  
8 Carney Number 4.

9 Do you know John Carney,  
10 Jack Carney?

11 A. Doesn't ring a bell.

12 Q. Take a look at that letter.

13 A. (Witness complies.)

14 Okay.

15 Q. After reading that letter  
16 can you confirm is that your signature at  
17 the bottom of the page?

18 A. It appears to be, yes.

19 Q. Do you know who Richard  
20 Berkes is?

21 A. Doesn't ring a bell.

22 Q. Do you see the letter is  
23 written to Environmental Hazards  
24 Services, Inc.?

1 Q. Did he own ATP or --

2 A. I don't know.

3 Q. -- did he work at ATP?

4 A. Yes.

5 Q. Frank, Senior, is he also at  
6 APTL?

7 A. No. He's retired as far as  
8 I know.

9 Q. He is deceased?

10 A. No.

11 Q. Is he deceased?

12 A. No.

13 Q. Atlantic Petroleum  
14 Technologies, Inc., the business, do you  
15 know who the shareholders were?

16 A. No.

17 Q. Do you know who the  
18 president was?

19 A. I think it was Lawrence.  
20 But I'm not sure.

21 Q. Did you ever enter into any  
22 business relationship with Lawrence?

23 A. I worked for him.

24 Q. You worked for him at



1 Atlantic Petroleum Technologies?

2 A. Right.

3 Q. After ATP did you ever work  
4 for him?

5 A. Yes.

6 Q. Where was that?

7 A. With Atlantic Petroleum  
8 Technologies Louisiana.

9 Q. Was that a successor to APT,  
10 Inc.?

11 A. It was formed after Atlantic  
12 Petroleum Technologies went bankrupt, as  
13 far as I know.

14 Q. When did they go bankrupt?

15 A. I believe it was '94.

16 Q. Is Atlantic Petroleum  
17 Technologies Louisiana still in business?

18 A. No.

19 Q. Did they go bankrupt?

20 A. I don't know.

21 Q. Are you still friends with  
22 the McLaughlin's?

23 A. Yes.

24 Q. You said you talked to